

**REGULATORY APPROACHES
TO REDUCE PARTICULATE MATTER EMISSIONS FROM
TRANSPORT REFRIGERATION UNITS**



September 4, 2002



**California Environmental Protection Agency
Air Resources Board**

Overview

- Action to-date
- Background
- Summary of last TRU proposal
- New Approach/Concepts
- Regulatory development schedule
- Contacts

Action To-Date

- 5th TRU Workgroup meeting
 - ◆ Plus 4 Special TRU Electrification Workgroup meetings
- 3 Public Workshops
- Reviewed feedback
- Established Control Technology Matrix
- Provided draft TRU regulation language

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Action To-Date (cont'd)

- Completed surveys
 - ◆ Several with TRU manufacturers
 - ◆ Several with TRU engine manufacturers
 - ◆ Emission control system manufacturers
- Completed 18 site surveys
- Collected cost data for alternative technologies
 - ◆ (e.g. electric standby (E/S), cryogenic, CNG)
- Working on demos

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Background

■ Mass emissions

- ◆ Number of TRUs: 45,000 to 55,000
- ◆ Total PM emissions
 - ✦ >3 tons per day (>1100 tons per yr)

■ Near source risk concerns

- ◆ TRUs operating near residences
 - ✦ Large numbers congregate: 1 to 500
 - ✦ Hours of operation: 2 to 5000 hrs/week

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Preliminary - Do Not Cite or Quote

Background (cont'd)

■ Potential Near-Source Risk

Grocery Stores

		0.7 g/bhp-hr										
	Hours per	Downwind Distance from the Area Source (meters)										
	week	20	40	60	80	100	120	140	160	180	200	220
TRU Operation	7											<=10/million
	14											
	20											
	30											
	40											10 to 100 per million
	50	>= 100/million										

Risk in potential cancers per million

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Preliminary - Do Not Cite or Quote

Background (cont'd)

■ Potential Near-Source Risk - Distribution Center

Hours Per Week	Hours Per Year	EF = 0.7 g/bhp-hr											
		Downwind Distance (m)											
		100	150	200	250	300	350	400	450	500	600	700	800
100	5200										< /= 10 / million		
150	7,800												
200	10,400												
250	13,000												
300	15,600												
350	18,200												
400	20,800												
450	23,400												
500	26,000												
600	31,200												
700	36,400												
800	41,600												
900	46,800												
1000	52,000												
1100	57,200												
1200	62,400												
1300	67,600												
1400	72,800												
1500	78,000												

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Risk in potential cancers per million

Last TRU Proposal Summary

■ Key Elements

◆ TRU Manufacturers

- ✦ New TRUs to be equipped with electric standby (E/S)

◆ Fleet Owners/Operators - Phased reqmnts

- ✦ Replace in-use TRUs with new TRUs equipped with E/S,
- ✦ Retrofit in-use TRUs to reduce PM emissions by 75% or to less than 0.15 g/bhp-hr, or
- ✦ Retrofit in-use TRUs with E/S

◆ Facility requirements

- ✦ Provide electric power infrastructure
- ✦ Prohibit diesel TRU operations at facility, if E/S-equipped

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Concerns Over Last Proposal

- Infrastructure required
- Availability of retrofit technology
- Cost
- Long term investment decisions
- Multiple, successive regulatory impacts
 - ◆ On-road & offroad standards
 - ◆ HACCP regulations

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New Approach

- Focus on both near-source and mass reductions
- Performance-based approach to provide flexibility
- Make the long-term regulatory goal clear

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Key Concepts

■ Engine Manufacturers

- ◆ Progressively more stringent TRU engine standards
- ◆ Examples
 - ✦ 0.30 g/bhp-hr by 2005 or earlier
 - ✦ 0.10 g/bhp-hr by 2010 or earlier
 - ✦ 0.01 g/bhp-hr by 2015 or earlier

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Key Concepts (cont'd)

■ TRU Owner/Operators

- ◆ Progressively more stringent in-use requirements
- ◆ Examples: Lower in-use emissions every 10 years by
 - ✦ Retrofit
 - ✦ Repower
 - ✦ Replace

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Key Concepts (cont'd)

■ TRU Manufacturers

- ◆ Provide options to customers
- ◆ Examples
 - ✦ Cleaner engines
 - ✦ Verified retrofit options
 - ✦ E/S with more capacity
 - ✦ Cryogenic systems
 - ✦ Alternative fueled TRU engines
 - ✦ Non-diesel-fueled TRU engines
 - ✦ Advanced technology

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Key Concepts (cont'd)

■ Facilities

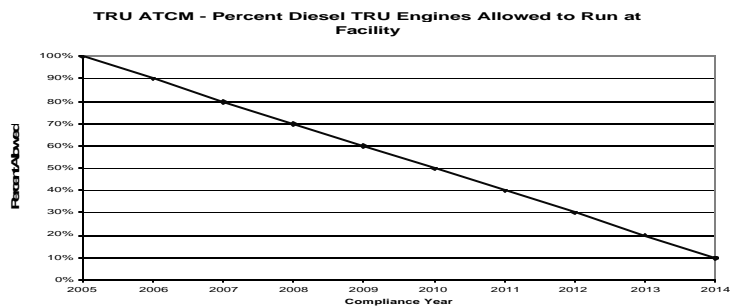
- ◆ Provide needed infrastructure in stepwise fashion
 - ✦ Electric drive
 - ✦ Cryogenic temperature control
 - ✦ Alternative fuels
 - ✦ Advanced technologies

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Key Concepts (cont'd)

■ Example

- ◆ Allow decreasing numbers of diesel TRUs to operate while at facility



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Schedule

- Next Public Workshop: Mid-November
- Board Hearing: Mid-2003
- Comments via email by October 1, 2002

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